



Digital Accessibility Centre

Accessibility Audit Report for W3C Prototype Pages

Company	Studio 24 for W3C
Date	19 th April 2021
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Standard	WCAG 2.1 AAA

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Executive Summary

An accessibility audit for ‘**W3C’s Prototype**’ pages was carried out by the Digital Accessibility Centre (DAC) user/technical team on **13th of March 2021**.

The service was assessed against the Web Content [Accessibility Guidelines WCAG 2.1](#). AAA level. A subsequent retest of the service was completed on **19th of April 2021** and this document incorporates the findings regarding any accessibility barriers identified during the testing process.

Many issues were found to be resolved. However, a small number of issues were found to remain pending. These included decorative images which were not implemented in a way that meant it could be ignored by assistive technology, a carousel for which the operation may not be clear to screen reader users and video content which did not offer a sign language interpretation for deaf users.

An additional new issue was also identified, whereby mechanism was not in place to allow users to identify when users interface controls had keyboard focus.

Usability feedback has been provided by the testing team on a range of issues identified throughout the process. This information can be found in the ‘Usability’ section of this report. Many usability issues the users encountered affected their personal experience of the website, and we feel these are equally important and should be addressed and/or considered.

Some usability issues have been marked as ‘high’ meaning although it does not fail any of the WCAG2.1 guidelines as such, it is important for this user that the issue is fixed to be able to interact effectively with the page.

Audit Summary

In order for the service to be eligible for a Digital Accessibility Centre certification, and/or comply with WCAG 2.1 requirements, improvements need to be made in the following areas.



A

[Decorative images](#)
[Carousel](#)



AA

[Focus Visible \(New Issue\)](#)



AAA

[Video content](#)



Scope

Tasks

Brief Task and/or URLs are listed below along with the specific browser and AT set.

URL: <https://w3c-dev.studio24.dev/>

- Header signed in - <https://w3c-dev.studio24.dev/header-signedin/index.html>
- Header not signed in - <https://w3c-dev.studio24.dev/header/index.html>
- Default page - <https://w3c-dev.studio24.dev/default/index.html>
- Landing page - <https://w3c-dev.studio24.dev/landing/index.html>
- Business ecosystem page - <https://w3c-dev.studio24.dev/business/index.html>

See [Appendix I](#) for a full list of tasks and instructions.

Browser matrix and Assistive Technology (AT) combinations

Desktop

User type	Operating System (OS)	Browser	Assistive Technology
Blind	Windows	Chrome/Edge Chromium	JAWS 18 and 2019
		Firefox	NVDA
Mobility	Windows	Chrome/Edge Chromium	Dragon Voice Activation v15
Mobility	Windows	Chrome/Edge Chromium	Keyboard
Colour blind/ Dyslexia	Windows	Chrome	-
Low Vision	Windows	Chrome/Edge Chromium	Screen Magnification, Reflow *, Text Spacing †
			System inverted colours
Cognitive Impaired	Windows	Chrome	-

* **Reflow** tests with screen size of 1280 x 1024px, at 400% browser magnification

† **Text Spacing** tests with larger Line height, and larger Paragraph, Word and Letter spacing.

Mobile/Tablet

User type	Code	Operating System (OS)	Browser	Assistive Technology
Blind	SR	iOS/Android	Safari/Chrome	VoiceOver
Low Vision	LV	iOS	Safari	Resizing content

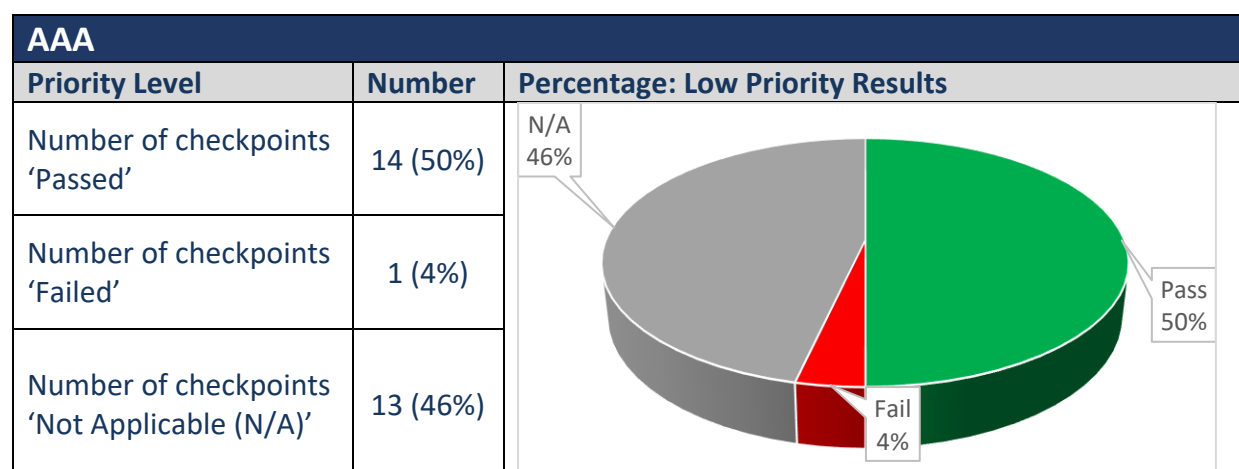
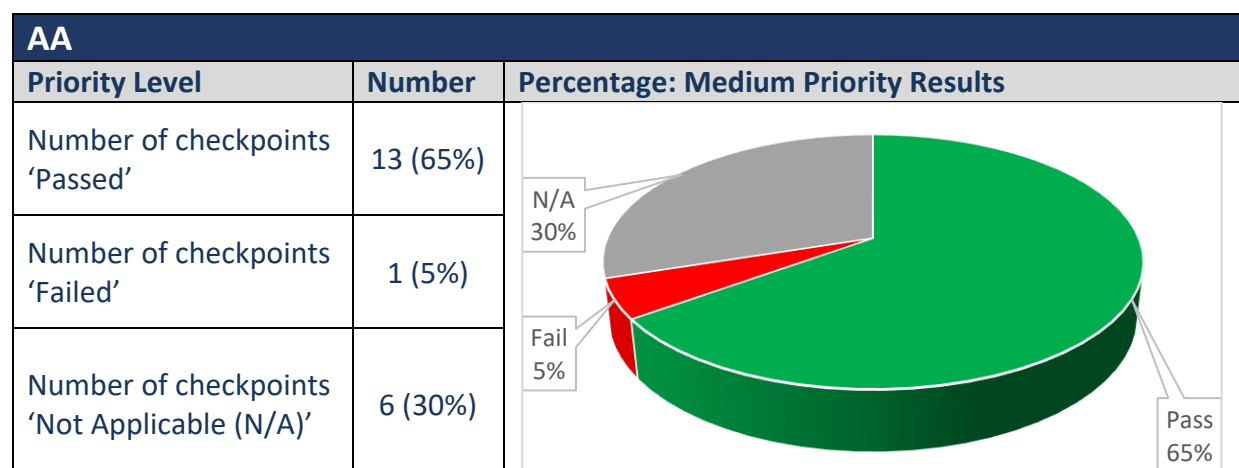
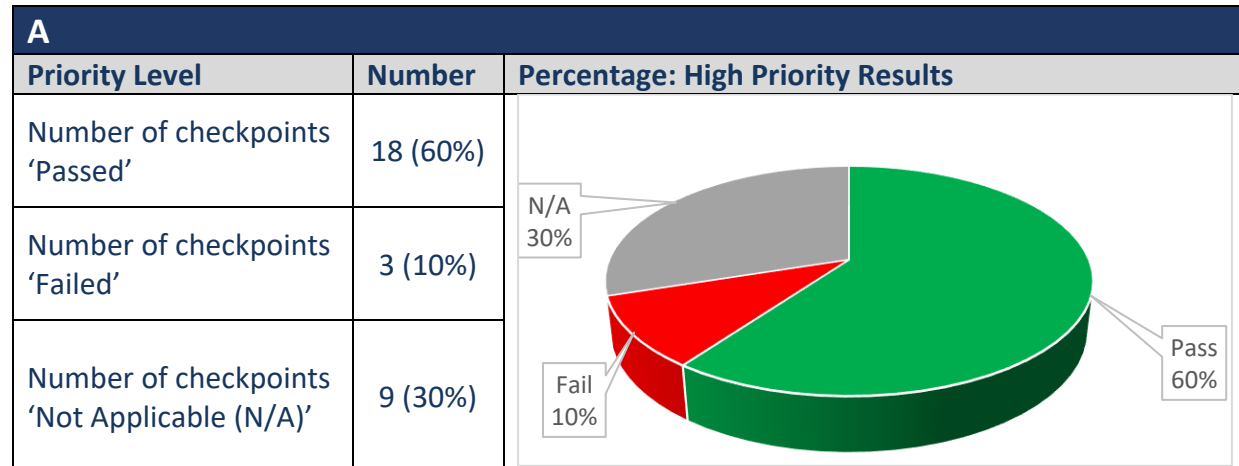


Summary Graphs

WCAG 2.1 Breakdown

The graphs below detail the number of checkpoints that passed, failed or were not applicable to the service.

Please refer to the [Classification of Accessibility Issues](#) for more information.



Audit Results

These are the results of the Digital Accessibility Centre accessibility audit by section.

Each area contains a reference to the WCAG success criteria, a brief overview of the issue encountered, a description of issues found along with user testing commentaries and solutions.



A - High

Decorative images

A decorative image was discoverable for screen reader users.

WCAG Reference:

1.1.1 Non-text Content (Level A)

[Understanding Non-text Content](#) | [How to Meet Non-text Content](#)

Issue ID: DAC-Decorative-images-Issue1

URL: <https://w3c-dev.studio24.dev/default/index.html>

Page title: W3C Mission (Default template) | W3C Redesign Prototypes

Journey: Default page

Screenshot:

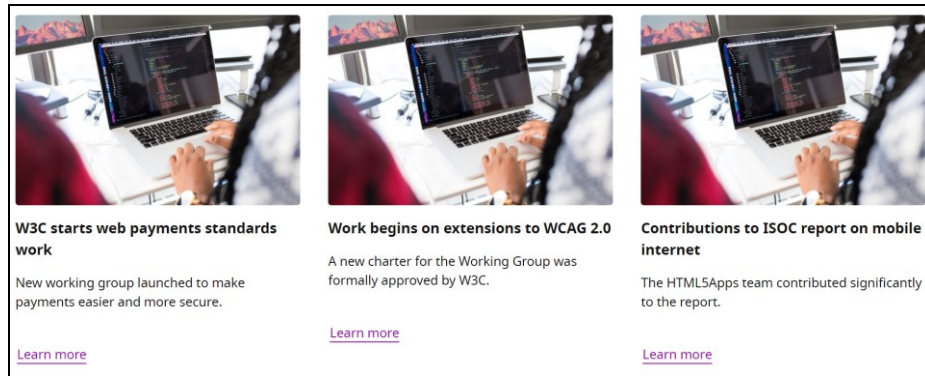


The figcaption is not a replacement for the image's alt attribute. It should be used for providing relevant supporting content.

Decorative images can often be confusing or time-consuming for screen readers to navigate past especially if there are multiple images on the page. It is currently not clear whether this image is being used as example for the prototype, or if it is intended to convey information to blind users.

Please note: on the 'Landing page prototype' there are a high number of similar images that should also be ignored using the null alt text.





Current code ref(s):

```

```

Screen reader comments:

"I located multiple images on the page which began with the phrase 'A Macbook screen.' These images may cause some disorientation to some screen reader users as the images are duplicated which may mean that users are not aware of where they are situated on the page. I further found that the images although descriptive did not add further useful information to the user journey and were time consuming to move past. It would assist screen reader users if all images could be hidden from screen reader users with the exception of images that either indicate a logo or are essential to the user journey. Alternatively all images should be given a unique description to avoid potential disorientation. **The issue is present with JAWS, NVDA and VoiceOver for iPhone.**"

Issue consistent for the following pages:

Landing page

<https://w3c-dev.studio24.dev/landing/index.html>

Business ecosystem

[Business ecosystem | W3C Redesign Prototypes \(studio24.dev\)](#)

Tested in: JAWS with Microsoft Edge Chromium and Google Chrome, NVDA with Firefox and VoiceOver for iPhone with Safari.

Solution:

The image does not appear to convey any meaningful information for blind users, so we recommend ensuring the image is ignored by screen reader users. This can be achieved by implementing null alt text.

Example:

```

```

Carousel

The carousel feature was problematic for a screen reader user.

WCAG Reference:

2.4.3 Focus Order (Level A)

[Understanding Focus Order](#) | [How to Meet Focus Order](#)

4.1.2 Name, Role, Value (Level A)

[Understanding Name, Role, Value](#) | [How to Meet Name, Role, Value](#)

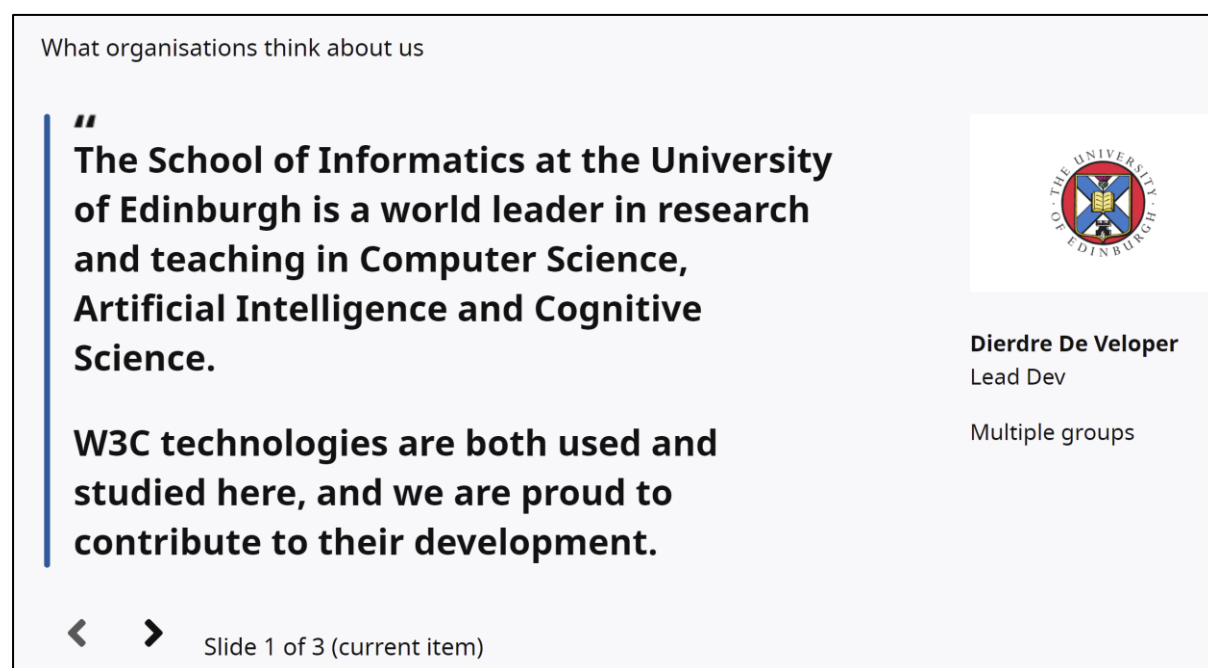
Issue ID: DAC-Carousel-Issue1

URL: <https://w3c-dev.studio24.dev/business/index.html>

Page title: Business ecosystem | W3C Redesign Prototypes

Journey: Business ecosystem page

Screenshot:



The association between the slide buttons and the content they trigger to change on the page is not clear. Although actioning the previous/ next slide button visually changes the content on the page, all the slides are always present and detectable with screen reading software, so that the purpose of the buttons appears to be ambiguous.

These buttons are also situated below the updating content so that a screen reader user would have to navigate backwards up the page to encounter the corresponding content. For more information, please refer to: <https://www.w3.org/TR/wai-aria-practices-1.1/examples/carousel/carousel-1.html?moreaccessible>.

The slides are implemented within a focusable for which there is an aria-label to describe its purpose as 'slider content', but no role is presented to screen reader users who are only given the instruction to 'use their arrow keys to navigate the slides' if they happen to be tabbing through the page rather than navigating in reading mode.

Although a status message is relayed when users change the slide using their left/ right arrow keys, when a user then attempts to press ESC and read the slide, they are always taken to the beginning of the first slide.

Current code ref(s): #main > div.component.component--slider.u-full-width

```
<div class="component component--slider u-full-width" data-component="slider">
  <div class="l-center">
    <h2>What organisations think about us</h2>
    <div class="js-slider">
      <ul class="clean-list" role="presentation" tabindex="0"
        aria-label="slider content"
        style="transform: translateX(-921.6px);">[...]</ul>
    </div>
    <ul class="slider-controls" aria-label="slider controls"
      style="display: inline-flex; margin-top: 0.625rem;">[...]</ul>
    <div role="status" aria-live="polite" style="display: inline-block;
      padding-left: 0.625rem; padding-right: 0.625rem;">Slide 2 of 3 (current
      item)</div>
    </div>
  </div>
```



Solution:

Ensure that when content is supposed to be hidden from users, it is equally hidden from assistive technology. This can be achieved via the CSS property 'display:none;'. Consider implementing the carousel controls above the slides so that the relevant content is placed next in reading order. Additionally, consider including some additional mark-up so that the boundaries of the carousel and the slides are clear to users navigating with screen reading software in reading mode rather than tabbing through the page.

Example:

```
<div class="component component--slider u-full-width" data-component="slider">
  <div class="l-center">
    <h2 id="carousel-title">What organisations think about us</h2>
    <section aria-roledescription="carousel" aria-labelledby="carousel-title">
      <ul class="slider-controls" aria-label="slider controls"
        style="display: inline-flex; margin-top: 0.625rem;">[...]</ul>
      <div role="status" aria-live="polite" style="display: inline-block;
        padding-left: 0.625rem; padding-right: 0.625rem;">Slide 2 of 3 (current
        item)</div>
      <div class="js-slider">
        <ul class="clean-list" role="presentation" tabindex="0"
          aria-label="slider content"
          style="transform: translateX(-921.6px);">
          <li class="" style="left: 0px;">
            <div class="slide" role="group"
              aria-roledescription="slide" aria-label="1 of 3">[...]</div>
          </li>
          [...]
        </ul>
      </div>
    </section>
  </div>
</div>
```



AA - Medium

Focus Visible (New Issue)

There were components with no mechanism to enable users to identify when they were in focus.

WCAG Reference:

2.4.7 Focus Visible (Level AA)

[Understanding Focus Visible](#) | [How to Meet Focus Visible](#)

Issue ID: DAC_Focus_Visible_01

Journey: All pages

Screenshot:



There is no mechanism to allow keyboard only users to identify when the hamburger menu nor the associated buttons within the menu have focus. This may impact the operability of the page for users reliant on the use of the keyboard alone to navigate.

Current Code Ref(s): #global-nav > div > button

```
<button type="button" class="button button--ghost with-icon--after with-icon--larger" data-trigger="mobile-nav" aria-expanded="true">Menu[...]</button>
```

Current Code Ref(s): #global-nav > div > ul

```
<ul class="clean-list" role="list" aria-hidden="false">[...]</ul>
```

CSS:

```
[data-trigger="mobile-nav"]:focus {  
  border-color: transparent;  
}
```

Solution:

Ensure there is a mechanism in place to allow users to identify when components are focused. For more information, please refer to [F78: Failure of Success Criterion 2.4.7 due to styling element outlines and borders in a way that removes or renders non-visible the visual focus indicator](#).



AAA - Low

Video content

The video did not provide sign language interpretation.

WCAG Reference:

1.2.6 Sign Language - Prerecorded (Level AAA)

[Understanding Sign Language \(Prerecorded\)](#) | [How to Meet Sign Language \(Prerecorded\)](#)

Issue ID: DAC-Video-Content-Issue1

URL: <https://w3c-dev.studio24.dev/landing/index.html>

Page title: Landing page | W3C Redesign Prototypes

Journey: landing page

Screenshot:



Written text for some deaf users may be their second language so it is beneficial for this user group to provide sign language. Sign language provides secondary information such as emotions and other audio information that is not reflected in captions.

Current code ref(s): N/A

Solution:

Sufficient Techniques to pass this guideline:

1. [G54: Including a sign language interpreter in the video stream](#)
2. [G81: Providing a synchronized video of the sign language interpreter that can be displayed in a different viewport or overlaid on the image by the player using one of the following techniques](#)
 - [SM13: Providing sign language interpretation through synchronized video streams in SMIL 1.0](#)
 - [SM14: Providing sign language interpretation through synchronized video streams in SMIL 2.0](#)



Usability

Reflow

The table is problematic to interact with for users using the reflow method.

WCAG Reference:

1.4.10 Reflow

[Understanding Reflow](#) | [How to Meet Reflow](#)

Issue ID: DAC-Reflow

URL: <https://w3c-dev.studio24.dev/default/index.html#main>

Page title: W3C Mission (Default template) | W3C Redesign Prototypes

Journey: Default page

Screenshot:



Melanie	Brown	Scary	29 19
Melanie	Chisholm	Sporty	12 Jan 19

Although tables are included as content that allows and requires two-dimensional layouts, the way in which the table is presented to users using the Reflow technique is highly problematic and time-consuming.

To view the content within the table, users must use an internal horizontal scrolling mechanism moving left or right, then then the page up/down scrolling mechanism from the browser. Users must switch between the two a number of times if they want to view the tables contents.

The user can also highlight text using the mouse and scroll to left/right with the mouse to view the content, but this is not the expected way to interact with content.

This will affect low vision users or any users that prefer to read the page in a single column to improve their reading experience.

Please note: The reflow technique is when the browser is magnified to 400% and the browser width is set to 1280px.



Current code ref(s):

```
.pcf-header .pcf-cookie-message {  
  -webkit-animation-name: slideInDown;  
  animation-name: slideInDown;  
  -webkit-animation-iteration-count: 1;  
  animation-iteration-count: 1;  
  -webkit-animation-duration: .5s;  
  animation-duration: .5s;  
  -webkit-animation-delay: 0s;  
  animation-delay: 0s;  
  -webkit-animation-timing-function: ease;  
  animation-timing-function: ease;  
  -webkit-animation-fill-mode: both;  
  animation-fill-mode: both;  
  -webkit-backface-visibility: hidden;  
  backface-visibility: hidden;  
  position: fixed;
```

Solution:

Ensure content can be presented to users without **loss of information** or functionality.
Where possible, allow the table to 'reflow' to fit the contents within the viewport.



Changes in text presentation

The changes in text presentation are not conveyed to screen reader users.

WCAG Reference:

Usability

Issue ID: DAC-Changes-in-text-presentation

URL: <https://w3c-dev.studio24.dev/default/index.html#main>

Page title: W3C Mission (Default template) | W3C Redesign Prototypes

Journey: Default page

Screenshot:

Emphasis and strong

Demonstrating the use of *emphasis* and **strong** for text.

Screen reader users or users that rely on audio feedback will be unable to determine that the text is bold or emphasised. This is because there is no appropriate markup to convey the difference in text.

Current code ref(s):

```
<p>Demonstrating the use of <em>emphasis</em> and <strong>strong</strong> for text.</p>
```

Screen reader comments:

"I found that examples of 'Strong' 'Small' and 'enthesis' text were provided.

JAWS and NVDA: I was not provided with an indication from the software that any difference had occurred. I would not have been made aware that there was any visual change to the text.

VoiceOver: The visual text appeared on its own separate line, however I would not have been aware that there was any special significance to this text as the software did not announce any further prompt.

It would benefit screen reader users if the examples provided are not used, with other methods for example a warning, or a heading used instead to indicate text of special significance."

Tested in: JAWS with Microsoft Edge Chromium and Google Chrome, NVDA with Firefox and VoiceOver for iPhone with Safari.



Solution:

You could provide some hidden text informing the user that the text is bold or emphasised. The use of `` and `` does not appear to work as standard for some browser's assistive technology.

Potential JAWS version bug

The status message does not announce for JAWS 2018 users.

WCAG Reference:

Usability

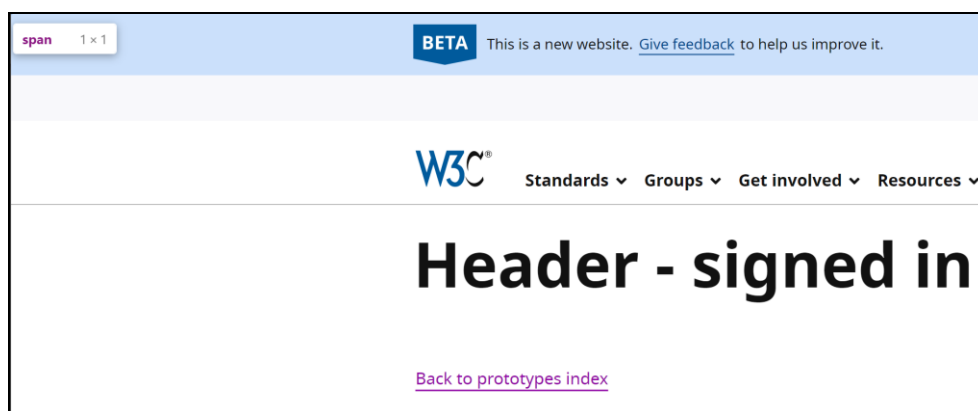
Issue ID: DAC-Potential-JAWS-version-bug

URL: <https://w3c-dev.studio24.dev/header-signedin/index.html>

Page title: Global header - signed in | W3C Redesign Prototypes

Journey- Header – signed in

Screenshot:



The status message to inform users that rely on audio feedback that they have unread messages is not conveyed to users using an older version of JAWS.

Current code ref(s):

```
<span role="status" aria-live="polite">You have unread messages</span>
```

Screen reader comments:

"A message is present near to the top of the page when I entered the page.

NVDA and VoiceOver: A clear status message announced to advise me that the message was present.

JAWS: Using JAWS 2018 for both browsers tested the message did not announce, with the content of the page announcing instead. This was problematic for me as it was not immediately clear that the message was present on the page, with some screen reader users potentially by-passing the message with some methods of navigation such as the 'Tab' key.

The technical auditor confirmed that with JAWS 2019 the status message does clearly announce to screen reader users. This may mean that some screen reader uses may not locate the message depending on the combination of screen reader version and browser."

Tested in: JAWS with Microsoft Edge Chromium and Google Chrome, NVDA with Firefox and VoiceOver for iPhone with Safari.

Solution:

No solution required, although you could inform users in your accessibility statement that up-to-date screen reader software is advisable as some accessibility issues may occur on older versions.

The message is present on page load and encountered by screen reader users after the 'skip to content' link. For a status message to be relayed, the contents of the container need to update. If this message is not supposed to be presented to users, please ensure it is hidden with 'display:none;', or that the container is unpopulated until the message is relevant.



End of Report



Appendix I

“From our prototype index at <https://w3c-dev.studio24.dev/> the items that can be tested now are:”

- Header – not signed in
- Header – signed in
(note header includes beta banner, language switcher top right, my account link. On the ‘my account link – signed in’ there is a notification button to indicate to a user there is some new activity for them to review. Nicki asked for this to be checked in particular)
- Default page – (everything but the section at the bottom with the blue background, titled ‘Section heading for these teasers’)
- Landing page – (everything but the section at the bottom with the blue background, titled ‘Section heading for these teasers’)
- Business ecosystem page – especially the carousel on this page (note some styling updates still need to be made for the carousel, but it shouldn’t affect the functionality of it)



Appendix II

Classification of Accessibility Issues

The following scoring system was used to indicate the status of the sites with regards to each W3C WAI checkpoint up to and including Level AAA:

Status	Description
Pass (P)	The site meets the requirements of the checkpoint.
Fail (L) Low Priority	The site almost meets the requirements of the checkpoint. Only a small number of minor problems were identified. The site fails to meet the requirements against AAA criteria measured against WCAG 2.1
Fail (M) Medium Priority	The site fails to meet the requirements against AA criteria measured against WCAG 2.1
Fail (H) High Priority	The site fails to meet the requirements against A criteria measured against WCAG 2.1 and more severe accessibility issues were identified.
Not Applicable (NOT APPLICABLE (N/A))	No content was found on the site to which the checkpoint would relate.



Principle 1: Perceivable – Information and users interface components must be presentable to users in ways they can perceive.

<p>Non-text Content:</p> <p><u>1.1.1</u> All non-text content that is presented to the user has a text alternative that serves the equivalent purpose.</p> <p>(Level A)</p>	Fail (H)
<p>Audio-only and Video-only (Pre-recorded):</p> <p><u>1.2.1</u> For pre-recorded audio-only and pre-recorded video-only media, the following are true, except when the audio or video is a media alternative for text and is clearly labelled as such:</p> <p><u>Understanding Success Criterion 1.2.1</u></p> <ul style="list-style-type: none"> • Pre-recorded Audio-only: An alternative for time-based media is provided that presents equivalent information for pre-recorded audio-only content. • Pre-recorded Video-only: Either an alternative for time-based media or an audio track is provided that presents equivalent information for pre-recorded video-only content. <p>(Level A)</p>	Pass (A)
<p>Captions (Pre-recorded):</p> <p><u>1.2.2</u> Captions are provided for all pre-recorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labelled as such.</p> <p>(Level A)</p>	Pass (A)
<p>Audio Description or Media Alternative (Pre-recorded):</p> <p><u>1.2.3</u> An alternative for time-based media or audio description of the pre-recorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labelled as such.</p> <p>(Level A)</p>	Pass (A)
<p>Captions (Live):</p> <p><u>1.2.4</u> Captions are provided for all live audio content in synchronized media.</p> <p>(Level AA)</p>	Not Applicable (N/A)
<p>Audio Description (Pre-recorded):</p> <p><u>1.2.5</u> Audio description is provided for all pre-recorded video content in synchronized media.</p> <p>(Level AA)</p>	Pass (AA)
<p>Sign Language (Pre-recorded):</p> <p><u>1.2.6</u> Sign language interpretation is provided for all pre-recorded audio content in synchronized media.</p> <p>(Level AAA)</p>	Fail (L)

Extended Audio Description (Pre-recorded): 1.2.7 Where pauses in foreground audio are insufficient to allow audio descriptions to convey the sense of the video, extended audio description is provided for all pre-recorded video content in synchronized media . (Level AAA)	Not Applicable (N/A)
Media Alternative (Pre-recorded): 1.2.8 An alternative for time-based media is provided for all pre-recorded synchronized media and for all pre-recorded video-only media. (Level AAA)	Not Applicable (N/A)
Audio-only (Live): 1.2.9 An alternative for time-based media that presents equivalent information for live audio-only content is provided. (Level AAA)	Not Applicable (N/A)
Info and Relationships: 1.3.1 Information, structure , and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)	Pass (A)
Meaningful Sequence: 1.3.2 When the sequence in which content is presented affects it's meaning, a correct reading sequence can be programmatically determined . (Level A)	Pass (A)
Sensory Characteristics: 1.3.3 Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound. (Level A)	Pass (A)



<p>Orientation: (WCAG 2.1)</p> <p>1.3.4 Content does not restrict its view and operation to a single display orientation, such as portrait or landscape, unless a specific display orientation is essential.</p> <p>Note: Examples where a particular display orientation may be essential are a bank check, a piano application, slides for a projector or television, or virtual reality content where binary display orientation is not applicable.</p> <p>(Level AA)</p>	<p>Pass (AA)</p>
<p>Identify Input Purpose: (WCAG 2.1)</p> <p>1.3.5 The purpose of each input field collecting information about the user can be programmatically determined when :</p> <ul style="list-style-type: none"> • The input field serves a purpose identified in the Input Purposes for User Interface Components section; and • The content is implemented using technologies with support for identifying the expected meaning for form input data. <p>(Level AA)</p>	<p>Not Applicable (N/A)</p>
<p>Identify Purpose: (WCAG 2.1)</p> <p>1.3.6 In content implemented using mark-up languages, the purpose of User Interface Components, icons, and regions can be programmatically determined.</p> <p>(Level AAA)</p>	<p>Not Applicable (N/A)</p>
<p>Use of Colour:</p> <p>1.4.1 Colour is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.</p> <p>(Level A)</p>	<p>Pass (P)</p>
<p>Audio Control:</p> <p>1.4.2 If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level.</p> <p>(Level A)</p>	<p>Not Applicable (N/A)</p>



<p>Contrast (Minimum): 1.4.3 The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following:</p> <ul style="list-style-type: none"> • Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1; • Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement. • Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement. <p>(Level AA)</p>	<p>Pass (AA)</p>
<p>Resize text: 1.4.4 Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality.</p> <p>(Level AA)</p>	<p>Pass (AA)</p>
<p>Images of Text: 1.4.5 If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: Understanding Success Criterion 1.4.5</p> <ul style="list-style-type: none"> • Customizable: The image of text can be visually customized to the user's requirements; • Essential: A particular presentation of text is essential to the information being conveyed. <p>Note: Logotypes (text that is part of a logo or brand name) are considered essential.</p> <p>(Level AA)</p>	<p>Not Applicable (N/A)</p>



<p>Contrast (Enhanced): 1.4.6 The visual presentation of text and images of text has a contrast ratio of at least 7:1, except for the following:</p> <ul style="list-style-type: none"> • Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 4.5:1; • Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement. • Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement. <p>(Level AAA)</p>	<p>Pass (AAA)</p>
<p>Low or No Background Audio: 1.4.7 For pre-recorded audio-only content that (1) contains primarily speech in the foreground, (2) is not an audio CAPTCHA or audio logo, and (3) is not vocalization intended to be primarily musical expression such as singing or rapping, at least one of the following is true:</p> <p>Understanding Success Criterion 1.4.7</p> <ul style="list-style-type: none"> • No Background: The audio does not contain background sounds. • Turn Off: The background sounds can be turned off. • 20 dB: The background sounds are at least 20 decibels lower than the foreground speech content, with the exception of occasional sounds that last for only one or two seconds. <p>Note: Per the definition of "decibel," background sound that meets this requirement will be approximately four times quieter than the foreground speech content.</p> <p>(Level AAA)</p>	<p>Not Applicable (N/A)</p>



<p>Visual Presentation:</p> <p>1.4.8 For the visual presentation of blocks of text, a mechanism is available to achieve the following:</p> <p>Understanding Success Criterion 1.4.8</p> <ol style="list-style-type: none"> 1. Foreground and background colours can be selected by the user. 2. Width is no more than 80 characters or glyphs (40 if CJK). 3. Text is not justified (aligned to both the left and the right margins). 4. Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing. 5. Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. <p>(Level AAA)</p>	<p>Pass (AAA)</p>
<p>Images of Text (No Exception):</p> <p>1.4.9 Images of text are only used for pure decoration or where a particular presentation of text is essential to the information being conveyed.</p> <p>Note: Logotypes (text that is part of a logo or brand name) are considered essential.</p> <p>(Level AAA)</p>	<p>Not Applicable (N/A)</p>
<p>Reflow: (WCAG 2.1)</p> <p>1.4.10 Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for :</p> <ul style="list-style-type: none"> • Vertical scrolling content at a width equivalent to 320 CSS pixels; • Horizontal scrolling content at a height equivalent to 256 CSS pixels. <p>Except for parts of the content which require two-dimensional layout for usage or meaning.</p> <p>Note: 320 CSS pixels is equivalent to a starting viewport width of 1280 CSS pixels wide at 400% zoom. For web content which are designed to scroll horizontally (e.g. with vertical text), the 256 CSS pixels is equivalent to a starting viewport height of 1024px at 400% zoom.</p> <p>Note: Examples of content which require two-dimensional layout are images, maps, diagrams, video, games, presentations, data tables, and interfaces where it is necessary to keep toolbars in view while manipulating content.</p> <p>(Level AA)</p>	<p>Pass (AA)</p>



<p>Non-text Contrast: (WCAG 2.1)</p> <p>1.4.11 The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent color(s):</p> <ul style="list-style-type: none"> • User Interface Components Visual information required to identify user interface components and states, except for inactive components or where the appearance of the component is determined by the user agent and not modified by the author; • Graphical Objects Parts of graphics required to understand the content, except when a particular presentation of graphics is essential to the information being conveyed. <p>(Level AA)</p>	<p>Pass (AA)</p>
<p>Text Spacing: (WCAG 2.1)</p> <p>1.4.12 presentation of graphics is essential to the information being conveyed.</p> <p>In content implemented using mark-up languages that support the following text style properties, no loss of content or functionality occurs by setting all of the following and by changing no other style property:</p> <ul style="list-style-type: none"> • Line height (line spacing) to at least 1.5 times the font size; • Spacing following paragraphs to at least 2 times the font size; • Letter spacing (tracking) to at least 0.12 times the font size; • Word spacing to at least 0.16 times the font size. <p>Exception: Human languages and scripts that do not make use of one or more of these text style properties in written text can conform using only the properties that exist for that combination of language and script.</p> <p>(Level AA)</p>	<p>Pass (AA)</p>



<p>Content on Hover or Focus: (WCAG 2.1)</p> <p>1.4.13 Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, the following are true:</p> <ul style="list-style-type: none"> • Dismissible A mechanism is available to dismiss the additional content without moving pointer hover or keyboard focus, unless the additional content communicates an input error or does not obscure or replace other content; • Hoverable If pointer hover can trigger the additional content, then the pointer can be moved over the additional content without the additional content disappearing; • Persistent The additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or its information is no longer valid. <p>Exception: The visual presentation of the additional content is controlled by the user agent and is not modified by the author.</p> <p>Note: Examples of additional content controlled by the user agent include browser tooltips created through use of the HTML title attribute.</p> <p>Note: Custom tooltips, sub-menus, and other nonmodal popups that display on hover and focus are examples of additional content covered by this criterion.</p> <p>(Level AA)</p>	<p>Pass (AA)</p>
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Principle 2: Operable – User interface components and navigation must be operable.

<p>Keyboard: 2.1.1 All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints.</p> <p>Note: This exception relates to the underlying function, not the input technique. For example, if using handwriting to enter text, the input technique (handwriting) requires path-dependent input, but the underlying function (text input) does not.</p> <p>Note: This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard operation. (Level A)</p>	<p>Pass (A)</p>
<p>No Keyboard Trap: 2.1.2 If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away.</p> <p>Note: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. (Level A)</p>	<p>Not Applicable (N/A)</p>
<p>Keyboard (No Exception): 2.1.3 All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes. (Level AAA)</p>	<p>Pass (AAA)</p>



<p>Character Key Shortcuts: (WCAG 2.1)</p> <p>2.1.4 If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true:</p> <ul style="list-style-type: none"> • Turn off: A mechanism is available to turn the shortcut off; • Remap: A mechanism is available to remap the shortcut to use one or more non-printable keyboard characters (e.g. Ctrl, Alt, etc); • Active only on focus: The keyboard shortcut for a user interface component is only active when that component has focus. <p>(Level A)</p>	<p>Not Applicable (N/A)</p>
<p>Timing Adjustable:</p> <p>2.2.1 For each time limit that is set by the content, at least one of the following is true:</p> <ul style="list-style-type: none"> • Turn off: The user is allowed to turn off the time limit before encountering it; • Adjust: The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; • Extend: The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; • Real-time Exception: The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; • Essential Exception: The time limit is essential and extending it would invalidate the activity; • 20 Hour Exception: The time limit is longer than 20 hours. <p>Note: This success criterion helps ensure that users can complete tasks without unexpected changes in content or context that are a result of a time limit. This success criterion should be considered in conjunction with Success Criterion 3.2.1, which puts limits on changes of content or context as a result of user action.</p> <p>(Level A)</p>	<p>Not Applicable (N/A)</p>



<p>Pause, Stop, Hide: 2.2.2 For moving, blinking, scrolling, or auto-updating information, all of the following are true: Understanding Success Criterion 2.2.2</p> <ul style="list-style-type: none"> • Moving, blinking, scrolling: For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and • Auto-updating: For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential. <p>Note: For requirements related to flickering or flashing content, refer to Guideline 2.3.</p> <p>Note: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion.</p> <p>Note: Content that is updated periodically by software or that is streamed to the user agent is not required to preserve or present information that is generated or received between the initiation of the pause and resuming presentation, as this may not be technically possible, and in many situations could be misleading to do so.</p> <p>Note: An animation that occurs as part of a preload phase or similar situation can be considered essential if interaction cannot occur during that phase for all users and if not indicating progress could confuse users or cause them to think that content was frozen or broken. (Level A)</p>	<p>Not Applicable (N/A)</p>
<p>No Timing: 2.2.3 Timing is not an essential part of the event or activity presented by the content, except for non-interactive synchronized media and real-time events. (Level AAA)</p>	<p>Not Applicable (N/A)</p>



<p>Interruptions: 2.2.4 Interruptions can be postponed or suppressed by the user, except interruptions involving an emergency. (Level AAA)</p>	<p>Not Applicable (N/A)</p>
<p>Re-authenticating: 2.2.5 When an authenticated session expires, the user can continue the activity without loss of data after re-authenticating. (Level AAA)</p>	<p>Not Applicable (N/A)</p>
<p>Timeouts: (WCAG 2.1) 2.2.6 Users are warned of the duration of any user inactivity that could cause data loss, unless the data is preserved for more than 20 hours when the user does not take any actions. Note: Privacy regulations may require explicit user consent before user identification has been authenticated and before user data is preserved. In cases where the user is a minor, explicit consent may not be solicited in most jurisdictions, countries or regions. Consultation with privacy professionals and legal counsel is advised when considering data preservation as an approach to satisfy this success criterion. (Level AAA)</p>	<p>Not Applicable (N/A)</p>
<p>Three Flashes or Below Threshold: 2.3.1 Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds. Note: Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. (Level A)</p>	<p>Not Applicable (N/A)</p>
<p>Three Flashes: 2.3.2 Web pages do not contain anything that flashes more than three times in any one-second period. (Level AAA)</p>	<p>Not Applicable (N/A)</p>



Animation from Interactions: (WCAG 2.1) 2.3.3 Motion animation triggered by interaction can be disabled, unless the animation is essential to the functionality or the information being conveyed. (Level AAA)	Not Applicable (N/A)
Bypass Blocks: 2.4.1 A mechanism is available to bypass blocks of content that are repeated on multiple Web pages . (Level A)	Pass (A)
Page Titled: 2.4.2 Web pages have titles that describe topic or purpose. (Level A)	Pass (A)
Focus Order: 2.4.3 If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability. (Level A)	Fail (H)
Link Purpose (In Context): 2.4.4 The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context , except where the purpose of the link would be ambiguous to users in general . (Level A)	Pass (P)
Multiple Ways: 2.4.5 More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process . (Level AA)	Pass (AA)
Headings and Labels: 2.4.6 Headings and labels describe topic or purpose. (Level AA)	Pass (P)



Focus Visible: 2.4.7 Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. (Level AA)	Fail (M)
Location: 2.4.8 Information about the user's location within a set of Web pages is available. (Level AAA)	Pass (AAA)
Link Purpose (Link Only): 2.4.9 A mechanism is available to allow the purpose of each link to be identified from link text alone, except where the purpose of the link would be ambiguous to users in general . (Level AAA)	Pass (P)
Section Headings: 2.4.10 Section headings are used to organize the content. Note: "Heading" is used in its general sense and includes titles and other ways to add a heading to different types of content. Note: This success criterion covers sections within writing, not user interface components . User Interface components are covered under Success Criterion 4.1.2 . (Level AAA)	Pass (AAA)
Pointer Gestures: (WCAG 2.1) 2.5.1 All functionality that uses multipoint or path-based gestures for operation can be operated with a single pointer without a path-based gesture, unless a multipoint or path-based gesture is essential. Note: This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology). (Level A)	Not Applicable (N/A)



<p>Pointer Cancellation: (WCAG 2.1) 2.5.2 For functionality that can be operated using a single pointer, at least one of the following is true:</p> <ul style="list-style-type: none"> • No Down-Event The down-event of the pointer is not used to execute any part of the function; • Abort or Undo Completion of the function is on the up-event, and a mechanism is available to abort the function before completion or to undo the function after completion; • Up Reversal The up-event reverses any outcome of the preceding down-event; • Essential Completing the function on the down-event is essential. <p>Note: Functions that emulate a keyboard or numeric keypad key press are considered essential.</p> <p>Note: This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology).</p> <p>(Level A)</p>	<p>Pass (A)</p>
<p>Label in Name: (WCAG 2.1) 2.5.3 For user interface components with labels that include text or images of text, the name contains the text that is presented visually.</p> <p>Note: A best practice is to have the text of the label at the start of the name.</p> <p>(Level A)</p>	<p>Pass (A)</p>



<p>Motion Actuation: (WCAG 2.1) 2.5.4 Functionality that can be operated by device motion or user motion can also be operated by user interface components and responding to the motion can be disabled to prevent accidental actuation, except when:</p> <ul style="list-style-type: none"> • Supported Interface The motion is used to operate functionality through an accessibility supported interface; • Essential The motion is essential for the function and doing so would invalidate the activity. <p>(Level A)</p>	<p>Pass (A)</p>
<p>Target Size (WCAG 2.1): 2.5.5 The size of the target for pointer inputs is at least 44 by 44 CSS pixels except when:</p> <ul style="list-style-type: none"> • Equivalent The target is available through an equivalent link or control on the same page that is at least 44 by 44 CSS pixels; • Inline The target is in a sentence or block of text; • User Agent Control The size of the target is determined by the user agent and is not modified by the author; • Essential A particular presentation of the target is essential to the information being conveyed. <p>(Level AAA)</p>	<p>Pass (AAA)</p>
<p>Concurrent Input Mechanisms (WCAG 2.1): 2.5.6 Web content does not restrict use of input modalities available on a platform except where the restriction is essential, required to ensure the security of the content, or required to respect user settings.</p> <p>(Level AAA)</p>	



Principle 3: Understandable – Information and the operation of user interface must be understandable.

Language of Page: 3.1.1 The default human language of each Web page can be programmatically determined . (Level A)	Pass (A)
Language of Parts: 3.1.2 The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text. (Level AA)	Pass (P)
Unusual Words: 3.1.3 A mechanism is available for identifying specific definitions of words or phrases used in an unusual or restricted way , including idioms and jargon . (Level AAA)	Not Applicable (N/A)
Abbreviations: 3.1.4 A mechanism for identifying the expanded form or meaning of abbreviations is available. (Level AAA)	Not Applicable (N/A)
Reading Level: 3.1.5 When text requires reading ability more advanced than the lower secondary education level after removal of proper names and titles, supplemental content , or a version that does not require reading ability more advanced than the lower secondary education level, is available. (Level AAA)	Pass (P)
Pronunciation: 3.1.6 A mechanism is available for identifying specific pronunciation of words where meaning of the words, in context, is ambiguous without knowing the pronunciation. (Level AAA)	Not Applicable (N/A)



On Focus: 3.2.1 When any component receives focus, it does not initiate a change of context . (Level A)	Pass (A)
On Input: 3.2.2 Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behaviour before using the component. (Level A)	Pass (A)
Consistent Navigation: 3.2.3 Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user. (Level AA)	Pass (AA)
Consistent Identification: 3.2.4 Components that have the same functionality within a set of Web pages are identified consistently. (Level AA)	Pass (AA)
Change on Request: 3.2.5 Changes of context are initiated only by user request or a mechanism is available to turn off such changes. (Level AAA)	Pass (AAA)
Error Identification: 3.3.1 If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text. (Level A)	Not Applicable (N/A)
Labels or Instructions: 3.3.2 Labels or instructions are provided when content requires user input. (Level A)	Pass (A)
Error Suggestion: 3.3.3 If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content. (Level AA)	Not Applicable (N/A)



<p>Error Prevention (Legal, Financial, Data): 3.3.4 For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true:</p> <ul style="list-style-type: none"> • Reversible: Submissions are reversible. • Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. • Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. <p>(Level AA)</p>	<p>Not Applicable (N/A)</p>
<p>Help 3.3.5 Context-sensitive help is available.</p> <ul style="list-style-type: none"> • Provide instructions and cues in context to help inform completion and submission. <p>(Level AAA)</p>	<p>Not Applicable (N/A)</p>
<p>Error Prevention (All): 3.3.6 For Web pages that require the user to submit information, at least one of the following is true:</p> <ul style="list-style-type: none"> • Reversible: Submissions are reversible. • Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. • Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. <p>(Level AAA)</p>	<p>Not Applicable (N/A)</p>



Principle 4: Robust – Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies

<p>Parsing: 4.1.1 In content implemented using mark-up languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features.</p> <p>Note: Start and end tags that are missing a critical character in their formation, such as a closing angle bracket or a mismatched attribute value quotation mark are not complete.</p> <p>(Level A)</p>	<p>Pass (A)</p>
<p>Name, Role, Value: 4.1.2 For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies.</p> <p>Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.</p> <p>(Level A)</p>	<p>Fail (H)</p>
<p>Status Messages (WCAG 2.1) 4.1.3 In content implemented using mark-up languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus.</p> <p>(Level AA)</p>	<p>Not Applicable (N/A)</p>



The Process

The service is measured against the Web Accessibility Initiative's (WAI) Web Content Accessibility Guidelines 2.1 (WCAG 2.1) to give an accurate feedback on any non-compliant issues. To attain our standard accreditation all A and AA criteria must be achieved.

To give a more accurate review of the service the DAC team employ two differing testing processes.

The first is a manual technical audit using automated tools and the second a dedicated team of user testers with differing disabilities test using a range of adaptive technologies. The findings of both testing teams are then combined to give the client far more accurate feedback on the service.

By using the testing team in conjunction with an automated procedure a more accurate set of results are made available.

This report combines technical auditing with disabled user feedback. The test does not list each specific area that requires change but highlights patterns of problems where they exist. Each section of the report includes a qualifying statement of pass, fail or recommendation to help developers quickly identify which parts of the service need the most urgent attention.

CRITERIA

High

The digital product has one or more issues that urgently need remediation. There will be a list of actions that the developers need to address to make sure that the product is functional for users of assistive technology.

Medium

The digital product has one or more issues that need remediation before meeting the WCAG 2.1 AA Standard. There will be a list of actions that the developers need to address to make sure that the product meets the expectations of the DAC testing team.

Low

The digital product has one or more issues that would cause minor barriers to users of assistive technology. While not necessary to meet the WCAG 2.1 AA Standard, these issues affect users negatively and should be remediated.

Usability

The digital product may have one or more issues that could cause minor difficulties to users of assistive technology. While not necessary to meet the WCAG 2.1 AA Standard, these issues were found to hinder users.



DAC Testing Procedure

The service is tested by a team of experienced auditors and analysts, many of who are disabled individuals and users of adaptive technology. The combination of subjective pan-disability user feedback and comprehensive technical auditing allows us to measure how the service performs technically and practically, thereby offering an essential added dimension to our test results that other methods of testing cannot provide.

User Testing

Manual accessibility checking was conducted by a team of disabled individuals, using a range of adaptive technologies (hardware and software designed to facilitate the use of computers by people with disabilities). This may include:

NVDA: a screen reader and application used by those who are blind.

ZoomText: a magnification application used by those with low vision.

JAWS: a screen reader used by blind people to access pages.

Dragon Naturally Speaking: voice activated software used by those that do not use a conventional input device such as a keyboard or mouse.

Switch Access: used by those with severe mobility impairments to input commands to a computer.

Keyboard Only: some users with mobility impairments have difficulty making precise movements required by pointing devices such as a mouse; therefore, a keyboard is used as the exclusive input device.

Readability: Manual checks were made to assess the suitability of a page for those with colour blindness and dyslexia.

Deaf/Hard of hearing: Manual checks were made to assess the suitability of a page for those with hearing impairments.

Learning difficulties: Manual checks were made to assess the suitability of a page for those with learning difficulties.

Technical Auditing

Technical auditing involves the experienced application of a number of technical auditing and standards compliance assessment tools. This combined with an extensive knowledge of WCAG, its application and wider global practice provides the DAC service with further credibility and quality.

Appendix IV

Retest resolved issues

Issue ID	Date fixed	Checked By	Additional Notes
Issue ID: DAC-Non-descriptive-links-issue1	19/04/2021	SP	
Issue ID: DAC-Non-descriptive-links-issue2	19/04/2021	SP	
Issue ID: DAC-Non-descriptive-image	19/04/2021	SP	
Issue ID: DAC-Incorrect-use-of-ARIA	19/04/2021	SP	
Issue ID: DAC-Non-descriptive-heading-Issue1	19/04/2021	SP	
Issue ID: DAC-Non-descriptive-labelling-Issue1	19/04/2021	SP	New related issue Issue ID: DAC Focus Visible 01.
Issue ID: DAC-Nested-landmarks	19/04/2021	SP	
Issue ID: DAC-Same-page-skip-links	19/04/2021	SP	Description included in heading
Issue ID: DAC-Lists	19/04/2021	SP	
Issue ID: DAC-Images	19/04/2021	SP	
Issue ID: DAC-Third-party-issue	19/04/2021	SP	